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Maureen A. Sockett
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By ECF

April 21, 2022

The Honorable Vincent L. Briccetti
United States District Judge
United States District Court for the Southern District of New York
300 Quarropas Street
White Plains, NY 10601-4150

Re: Robles, et al. v. Kollias, et al., 20-Civ.-4200 (VB)(AEK)

Dear Judge Briccetti:

We represent the Plaintiffs, Maura Robles and Ida Bravo, in this case involving, *inter alia*, unpaid wages, age discrimination and sexual harassment. We are writing regarding Defendant Danielle's Kollias's *post answer* motion (Dkt No 116) seeking dismissal of the Complaint against her filed late last night.

Despite the vague characterization of the motion as one based on a lack of jurisdiction and/or frivolous claims, among other things, no procedural rule or basis is noted in the motion, neither FRCP Rules 11, 12 nor 56. The motion substantively seeks this Court to make findings of facts as to the merits of Plaintiff's claims against Danielle, it is nothing more than a motion for summary judgment. It was filed post-answer. Despite it being a motion for summary judgment, there is no Rule 56.1 Statement. Nor was the motion submitted in accordance with your rules of chamber (Rule 2(B)(ii)), which obligate parties making certain motions to request a pre-motion conference first and submit a letter brief in support thereof. We believe Ms. Kollias and her counsel should be obligated to comply with these rules. We request this Court to deem her motion a nullity until and unless she complies with your chamber rules and the federal rules.

Respectfully submitted,

/s/Steven T. Sledzik

Steven T. Sledzik

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cc: Gunilla Perez-Faringer (counsel for Danielle Kollias, by ECF and email)
Scott Salant, Esq. (counsel for the represented Defendants by ECF)
Ida Bravo and Maura Robles (by email)

For the reasons set forth in this letter,
defendant Danielle Kollias's motion to dismiss
(Doc #116) is DENIED WITHOUT PREJUDICE.
Clerk shall terminate the motion. (Doc. #116)

So Ordered:

W. B. [Signature]
4/21/2022